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Special Counsel to the Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., et al.,

Debtors.¹

Chapter 11

Case No. 19-23649 (RDD)

**SUPPLEMENT TO FIRST INTERIM FEE APPLICATION OF WILMER
CUTLER PICKERING HALE AND DORR LLP FOR ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES**

Wilmer Cutler Pickering Hale and Dorr LLP (“**WilmerHale**”), special counsel for the
above-captioned debtors and debtors in possession (collectively, the “**Debtors**”), hereby
supplements the *First Interim Fee Application of Wilmer Cutler Pickering Hale and Dorr LLP
for Allowance of Compensation and Reimbursement of Expenses* [Docket No. 941] (the

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P.) (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products, L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

“**Application**”) for the period from September 16, 2019 through January 31, 2020 (the “**Interim Fee Period**”) with **Exhibits A through E**, attached hereto, in order to comply with certain requirements of the *Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under United States Code by Attorneys in Larger Chapter 11 Cases* (the “**UST Guidelines**”).

In addition, WilmerHale respectfully addresses the questions set forth in section C.5 of the UST Guidelines as follows:

- a. **Question:** Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.

Answer: The fees charged by WilmerHale in these cases are billed in accordance with its agreed-upon billing rates. Prior to the petition date, the Debtors and WilmerHale agreed to a discounted fee arrangement, which WilmerHale and the Debtors agreed to maintain during the Interim Fee Period.

- b. **Question:** If the fees sought in the fee application as compared to the fees budgeted for the time period covered by the fee application are higher by 10% or more, did you discuss the reasons for the variation with the client?

Answer: Not Applicable. An hourly rate for the matter was budgeted, with total hours variable based on volume and timing of congressional requests.

- c. **Question:** Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?

Answer: The professionals included in the Application did not vary their hourly rate based on geographic location of the bankruptcy case.

- d. **Question:** Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing or revising invoices other than reasonable fees for preparing fee applications? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application). If so, please quantify by hours and fees.

Answer: During the Interim Fee Period, in connection with preparing certain monthly fee statements, WilmerHale spent 5.50 hours for an aggregate value of \$3,876.00 reviewing time records and invoices to ensure compliance with fee guidelines.

- e. **Question:** Does the fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

Answer: During the Interim Fee Period, in connection with preparing certain monthly fee statements, WilmerHale spent 8.80 hours for an aggregate value of \$2,834.50 reviewing time records to redact any privileged or other confidential information.

- f. **Question:** If the fee application includes any rate increases since retention: (i) Did your client review and approve those rate increases in advance? (ii) Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA Formal Ethics Opinion 11-458?

Answer: During the Interim Fee Period, WilmerHale increased its standard billing rates effective as of January 1, 2020 and negotiated a reduction of those rates with the Debtors.

Dated: March 25, 2020
New York, New York

By: /s/ George W. Shuster, Jr.
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EXHIBIT A

CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES

WilmerHale's hourly rates for services rendered in these chapter 11 cases are comparable to the hourly rates charged in complex chapter 11 cases by comparably skilled attorneys. In addition, WilmerHale's hourly rates for services rendered in these chapter 11 cases are comparable to the rates charged by the firm, and by comparably skilled practitioners in other firms, for complex regulatory and government affairs matters, whether in court or otherwise, regardless of whether a fee application is required. WilmerHale's blended hourly rates for attorneys and paraprofessionals for the 12-month period preceding the end of the Interim Fee Period are as set forth below.

CATEGORY OF TIMEKEEPER	BLENDED HOURLY RATE	
	Billed Firmwide for preceding year, excluding bankruptcy ¹	Billed First Interim Fee Application
Partner	\$1,053.96	\$972.47
Counsel	\$858.57	\$867.69
Associate & Attorney	\$563.27	\$512.04
Paraprofessional	\$347.93	\$324.51
All Timekeepers Aggregated:	\$711.02	\$602.19

¹ The blended hourly rate includes discounts and write-downs to reflect amounts that were actually billed by the firm.

EXHIBIT B

SUMMARY OF TIMEKEEPERS IN FIRST INTERIM APPLICATION

(SEPTEMBER 16, 2019 – DECEMBER 31, 2019)¹

Professional	Position, Year of Bar Admission, Department	Negotiated Hourly Billing Rate	Total Hours Billed	Total Compensation
Partners				
Reginald J. Brown	Partner; admitted to DC Bar and FL Bar since 1998; Regulatory and Government Affairs.	1,355.00	10.10	13,685.50
Alyssa DaCunha	Partner; admitted to VA Bar since 2010 and DC Bar 2012; Regulatory and Government Affairs.	850.00	86.00	73,100.00
George W. Shuster, Jr.	Partner; admitted to MA Bar since 2001 and NY Bar since 2010; Bankruptcy & Financial Restructuring (“BFR”).	1,060.00	3.10	3,286.00
Partners Total			99.20	\$90,071.50
Counsel				
John T. Byrnes	Counsel; admitted to NY Bar since 2013 and DC Bar since 2014; Government & Regulatory Litigation.	775.00	48.40	37,510.00
Sean A. Hayes	Counsel; admitted to DC Bar since 2006; Regulatory and Government Affairs.	825.00	3.10	2,557.50
Isley Markman Gostin	Counsel; admitted to NY and IL Bars since 2011 and DC Bar since 2012; BFR.	850.00	0.50	425.00

¹ WilmerHale’s standard billing rates changed during the Interim Fee Period. WilmerHale increased its standard billing rates effective as of January 1, 2020. The rates reflected in this chart are for 2019 only.

Professional	Position, Year of Bar Admission, Department	Negotiated Hourly Billing Rate	Total Hours Billed	Total Compensation
Nancy L. Manzer	Special Counsel; admitted to NY and DC Bar since 1989 and VA Bar since 2002; BFR.	990.00	34.70	34,353.00
Counsel Total			86.70	\$74,845.50
Associates and Attorneys				
Patricia Hromada	Sr. Staff Attorney; admitted to WV Bar since 2003 and DC Bar since 2005; Discovery Solutions.	475.00	88.50	42,037.50
Sheila E. Menz	Sr. Associate; admitted to CA Bar since 2015 and DC Bar since 2017; Regulatory and Government Affairs.	590.00	153.30	90,447.00
Meredith Moriarty	Discovery Attorney; admitted to OH Bar since 2010; Discovery Solutions.	90.00	4.60	414.00
Elena M. Satten-Lopez	Associate; admitted to DC Bar in 2020; Regulatory and Government Affairs.	495.00	35.80	17,721.00
Phoebe Stroede	Sr. Discovery Attorney; admitted to OH Bar since 2012; Discovery Solutions.	300.00	53.40	16,020.00
Associates and Attorneys Total			335.60	\$166,639.50
Paraprofessionals				
Jeremiah Chandler	Co-op Student; Discovery Solutions.	135.00	1.60	216.00
William E. Lannon	Paralegal; Litigation / Controversy.	280.00	11.40	3,192.00
Kevin Le	Sr. Litigation Support Coordinator; Discovery Solutions.	430.00	2.90	1,247.00
Paul J. Maher	Sr. Research and Reference Specialist; Library and Research Services.	455.00	0.20	91.00

Professional	Position, Year of Bar Admission, Department	Negotiated Hourly Billing Rate	Total Hours Billed	Total Compensation
Aaron P. Murphy	Research and Reference Specialist; Library and Research Services.	375.00	1.40	525.00
Elizabeth W. Rockett	Legislative Assistant; Regulatory and Government Affairs.	245.00	42.40	10,388.00
Tamir Shemesh	Project Assistant; Securities Litigation & Enforcement.	245.00	44.50	10,902.50
Yolande Thompson	Sr. Paralegal; BFR.	425.00	55.90	23,757.50
Paraprofessionals Total			160.30	\$50,319.00
2019 TOTAL			681.80	\$381,875.50
Less Agreed Reduction				-57,281.33
2019 GRAND TOTAL			681.80	\$324,594.17

SUMMARY OF TIMEKEEPERS IN FIRST INTERIM APPLICATION
(JANUARY 1, 2020 - JANUARY 31, 2020)

Professional	Position, Year of Bar Admission, Department	Negotiated Hourly Billing Rate²	Total Hours Billed	Total Compensation
Partners				
Reginald J. Brown	Partner; admitted to DC Bar and FL Bar since 1998; Regulatory and Government Affairs.	1,550.00	12.00	18,600.00
Alyssa DaCunha	Partner; admitted to VA Bar since 2010 and DC Bar 2012; Regulatory and Government Affairs.	965.00	71.30	68,804.50
Partners Total			83.30	\$87,404.50
Counsel				
John T. Byrnes	Counsel; admitted to NY Bar since 2013 and DC Bar since 2014; Government & Regulatory Litigation.	940.00	5.30	4,982.00
Counsel Total			5.30	\$4,982.00
Associates and Attorneys				
Patricia Hromada	Sr. Staff Attorney; admitted to WV Bar since 2003 and DC Bar since 2005; Discovery Solutions.	525.00	17.60	9,240.00
Sheila E. Menz	Sr. Associate; admitted to CA Bar since 2015 and DC Bar since 2017; Regulatory and Government Affairs.	815.00	13.30	10,839.50
Elena M. Satten-Lopez	Associate; admitted to DC Bar in 2020; Regulatory and Government Affairs.	550.00	30.00	16,500.00
Allyson M. Pierce	Associate; admitted to CA Bar in 2019; BFR.	595.00	7.10	4,224.50

² WilmerHale increased its standard billing rates effective as of January 1, 2020 and negotiated a reduction of those rates with the Debtors.

Professional	Position, Year of Bar Admission, Department	Negotiated Hourly Billing Rate ²	Total Hours Billed	Total Compensation
Phoebe Stroede	Sr. Discovery Attorney; admitted to OH Bar since 2012; Discovery Solutions.	300.00	3.70	1,110.00
Associates and Attorneys Total			71.70	\$41,914.00
Paraprofessionals				
Clara Cabrera	Research & Reference Supervisor; Library and Research Services.	505.00	0.40	202.00
Truong Chau	Litigation Support Coordinator; Litigation Support.	480.00	4.60	2,208.00
Eric Robert Dolce	Project Assistant; Litigation / Controversy.	310.00	0.90	279.00
William E. Lannon	Paralegal; Litigation / Controversy.	385.00	8.90	3,426.50
Allyson Lazarre	Co-op Student; Litigation Support.	155.00	0.40	62.00
Aaron P. Murphy	Research and Reference Specialist; Library and Research Services.	415.00	0.70	290.50
Elizabeth W. Rockett	Legislative Assistant; Regulatory and Government Affairs.	275.00	10.40	2,860.00
Tamir Shemesh	Project Assistant; Securities Litigation & Enforcement.	275.00	4.00	1,100.00
Yolande Thompson	Sr. Paralegal; BFR.	545.00	5.00	2,725.00
Saige Wenik	Sr. Project Assistant; Litigation / Controversy.	325.00	3.50	1,137.50
Paraprofessionals Total			38.80	\$14,290.50
2020 TOTAL			199.10	\$148,591.00
Less Agreed Reduction				-17,830.92
Less 50% Non-Working Travel³				-6,710.00
2020 GRAND TOTAL			199.10	\$124,050.08

³ During the Interim Fee Period, fees for legal services rendered by WilmerHale included non-working travel time in the aggregate amount of \$13,420.00. In accordance with the U.S. Trustee's Guidelines, WilmerHale deducted 50% of the respective professionals' hourly rates from the respective Fee Statement.

TOTAL FOR INTERIM FEE PERIOD	880.90	\$530,466.50
LESS REDUCTION FOR 2019 & 2020		-\$81,822.25 ⁴
GRAND TOTAL FOR INTERIM FEE PERIOD	880.90	\$448,644.25

⁴ This amount reflects an agreed reduction in fees in the aggregate amount of \$75,112.25 and 50% reduction of non-working travel time in the amount of \$6,710.00.

EXHIBIT C

BUDGET¹

PROJECT CATEGORY	ESTIMATED HOURS	ESTIMATED FEES
Fee/Employment Applications (B160)	N/A	N/A
Congressional Investigation (L400)	N/A	N/A
TOTAL	N/A	N/A

STAFFING PLAN²

CATEGORY OF TIMEKEEPER	NUMBER OF TIMEKEEPERS	RANGE OF HOURLY RATE
Partner	N/A	N/A
Counsel	N/A	N/A
Associate & Attorney	N/A	N/A
Paraprofessional	N/A	N/A

¹ Not Applicable. An hourly rate for the matter was budgeted, with total hours variable based on volume and timing of congressional requests. WilmerHale will prepare a budget for future fee periods with the understanding that the amounts in the budget are subject to change due to the volume and timing of the congressional requests.

² Not Applicable. WilmerHale designated a core team but retained flexibility to expand or contract the team based on case needs.

EXHIBIT D

SUMMARY OF COMPENSATION AND EXPENSES REIMBURSEMENT

SUMMARY OF COMPENSATION REQUESTED BY PROJECT CATEGORY

PROJECT CATEGORY	TOTAL HOURS	TOTAL FEES
Fee/Employment Applications (B160)	121.60	77,944.50
Congressional Investigation (L400)	759.30	452,522.00
Total	880.90	\$530,466.50
Less Agreed Reduction		-75,112.25
Less 50% Non-Working Travel¹		-6,710.00
GRAND TOTAL	880.90	\$448,644.25

SUMMARY OF EXPENSE REIMBURSEMENT REQUESTED BY CATEGORY

CATEGORY	AMOUNT
Data Hosting	172.80
Document Printing	183.30
Federal Express	19.91
Local Transportation	92.04
Meals-Out of Town	60.95
Out of Town Lodging	368.58
Photocopying	16.30
Transcript	900.00
Travel	1,715.42
TOTAL	\$3,529.30

¹ During the Fee Period, fees for legal services rendered by WilmerHale included non-working travel time in the aggregate amount of \$13,420.00. In accordance with the U.S. Trustee's Guidelines, WilmerHale deducted 50% of the respective professionals' hourly rates from the respective Fee Statement.

EXHIBIT E

SUMMARY OF FIRST INTERIM FEE APPLICATION

Name of applicant	Wilmer Cutler Pickering Hale and Dorr LLP
Name of client	Purdue Pharma L.P., <i>et al.</i>
Time period covered by application	September 16, 2019 to January 31, 2020
Total compensation sought this period	\$448,644.25¹
Total expenses sought this period	\$3,529.30
Petition date	September 15, 2019
Retention date	<i>Nunc Pro Tunc</i> to September 15, 2019
Date of order approving employment	November 25, 2019
Total compensation approved by interim order to date	N/A
Total expenses approved by interim order to date	N/A
Total allowed compensation paid to date	\$0.00
Total allowed expenses paid to date	\$0.00
Blended rate in application for all attorneys	\$683.28
Blended rate in application for all timekeepers	\$602.19
Compensation sought in application already paid pursuant to a monthly compensation order but not yet allowed	\$0.00
Expenses sought in application already paid pursuant to a monthly compensation order but not yet allowed	\$0.00
Number of professionals included in application	26
If applicable, number of professionals in application not included in staffing plan approved by client	N/A
If applicable, difference between fees budgeted and compensation sought during application period	Amt. Budgeted: N/A Amount Sought: \$448,644.25
Number of professionals billing fewer than 15 hours to the case during application period	10
Are any rates higher than those approved or disclosed at retention?	WilmerHale increased its standard billing rates effective as of January 1, 2020 ²

¹ This amount reflects a reduction in fees in the aggregate amount of \$81,822.25 on account of an agreed reduction in the aggregate amount of \$75,112.25 and 50% reduction of non-working travel time in the amount of \$6,710.00.

² WilmerHale also negotiated a reduction of those rates with the Debtors as set forth in the *Wilmer Cutler Pickering Hale and Dorr LLP's First Notice of Increase in Hourly Rates* [Docket No. 653] and Exhibit B attached hereto.